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Of Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**DR. RUPA BALA,**

Plaintiff,

v.

**OREGON HEALTH AND SCIENCE  
UNIVERSITY, an Oregon public corporation;  
DR. CHARLES HENRIKSON, an individual;  
DR. JOAQUIN CIGARROA, an individual.**

Defendants.

**CASE NO. 3:18-CV-00850-HZ**

**PLAINTIFF'S EXHIBIT LIST**

#	Date	Description	Joint/Prea dmit	Off'd	Rec'd
1	Undated	OHSU Code of Conduct BALA000733-000769 (Dep ex. 11)			
2	Undated	EEOC Policy on Equal Opp OHSU_RB 000326-000330 (Dep Ex. 76)			
3	Undated	EEOC Policy on Equal Opp complaints OHSU_RB 000334- 000337 (Dep Ex. 77)			
4	Undated	Ombudsman; purpose and scope (Dep Ex. 195)			
5	Undated	Staff Bylaws (Dep Ex. 231)			

6	Undated (effective 1/1/09)	Policy: terminations and non-renewal of classified employees (Dep Ex. 208)			
7	5/29/14	Kaul letter regarding hiring Bala (Dep Ex. 191)			
8	6/20/14	Parmacek Letter of Recommendation for Bala to Kaul (Dep Ex. 192)			
9	7/22/14	Signed Offer letter OHSU_RB 000020-000023 (Dep Ex. 6)			
10	8/24/14	Employment Agreement with OHSU OHSU_RB 000050-000073 (Dep Ex. 7)			
11	2/7/15	Email with Bala and Henrikson; OHSU_RB 001913-001914 (Dep Ex. 33)			
12	4/8/15	Email re provisional appt for Bala OSHU_RB 002186-002187 (Dep Ex. 162)			
13	5/4/15	U Penn Faculty Evaluations OHSU_RB 001524-001531 (Dep Ex. 23)			
14	5/4/15	Email re double booking EPs OHSU_RB 02208-002209 (Dep Ex. 176)			
15	5/8/15	Email re changes to cath lab OHSU_RB 001662 (Dep Ex. 177)			
16	7/14/15	Email re sheath protocols OHSU_RB 001832-001833 (Dep Ex. 178)			
17	8/10/15	Email re sheath protocols OHSU_RB 001683-001684 (Dep Ex. 163)			
18	8/19/15	Email re communication, BALA 00214-00215 (Dep Ex. 21, 36)			
19	8/19/15	Email re anesthesia scheduling OHSU_RB 002118 (Dep Ex. 34)			
20	8/19/15	Email re concerns re anesthesia and heparin OHSU_RB 001505-001506 (Dep Ex. 37)			
21	8/20/15	Email re sheath protocol OHSU_RB 002169-002170 (Dep Ex. 38)			
22	9/15/15	Email re teaching Lidjia OHSU_RB 000756-000757 (Dep Ex. 166)			
23	9/17/15	Email re professionalism OHSU_RB 001698 (Dep Ex. 164)			

24	9/17/15	Email re professionalism OHSU_RB 000104-000105 (Dep Ex. 167)			
25	9/18/15	Email from JC to SK, CH and AC w meeting summary of RB OHSU_RB 001696-001697 (Dep Ex. 165)			
26	9/22/15	Email re case getting bumped bc of no cardiac anesthesia OHSU_RB 001675-001677 (Dep Ex. 40)			
27	10/2015	Strahm notes of meeting w Henrikson re Bala OHSU_RB 000786-000787 (Dep Ex. 80, 181)			
28	10/2/15	Email re PEP OHSU_RB 001879- 001880 (Dep Ex. 79)			
29	10/5/15	Email re probation OHSU_RB 001876 (Dep Ex. 169)			
30	10/6/15	Email from Kaul re PEP OHSU_RB 001874-001875 (Dep Ex. 78)			
31	10/7/15	Draft PEP OHSU_RB 001871- 001873 (Dep Ex. 81)			
32	10/9/15	OHSU_RB 000100-000101 (Dep Ex. 82)			
33	10/21/15	Bala email re Lydia BALA 00196- 00198 (Dep Ex. 14, 193)			
34	11/1/15	Response to PEP; OHSU_RB 001960-001985 (Dep Ex. 83, 15)			
35	11/2/15	Emails re response to PEP OHSU_RB 002076-002077 (Dep Ex. 84)			
36	11/11/15	Email re good work on case OHSU_RB 000806 (Dep Ex. 51)			
37	11/12/15	Kirsch Email blast OHSU_RB 001952-001953 (Dep Ex. 13)			
38	11/12/15	Email 1 re Kirsch email blast OHSU_RB 001958-001959 (Dep Ex. 42)			
39	11/12/15	Email 2 re Kirsch email blast OHSU_RB 001863-001865 (Dep Ex. 44)			
40	11/12/15	Email 3 re Kirsch email blast OHSU_RB 002062-002064 (Dep Ex. 47)			
41	11/12/15	Email 4 re Kirsch email blast OHSU_RB 001469 (Dep Ex. 48)			

42	11/12/15	Email re RB response to JK email blast (PS, CK, CH) OHSU_RB 001952-001953 (Dep Ex. 49)			
43	11/12/15	KHA email re Bala sheath protocol (Dep Ex. 214)			
44	11/13/15	Email w LS, CK, LS and CG re RB response to JK OHSU_RB 002072-002073 (Dep Ex. 86)			
45	11/13/15	Strahm meeting notes w Henrikson OHSU_RB 000740A (Dep Ex. 87)			
46	11/16/15	Strahm meeting notes w Sue Barton OHSU_RB 000733-000737 (Dep Ex. 88)			
47	11/17/15	Bardon email to CH re Bala and male doctors OHSU_RB 002207 (Dep Ex. 55)			
48	11/18/15	Strahm meeting notes w Bob Shangraw OHSU_RB 000738A-000739 (Dep Ex. 89)			
49	11/19/15	Strahm meeting notes w Olga OHSU_RB 000732 (Dep Ex. 90)			
50	11/19/15	Emails re people ganging up on Bala" OHSU_RB 001861-001862 (Dep Ex. 56, 91)			
51	11/20/15	Email re Kirsch email blast OHSU_RB 001856-001858 (Dep Ex. 57, 92)			
52	11/20/15	Email re Kirsch investigation findings OHSU_RB 001468 (Dep Ex. 93)			
53	11/25/15	Email re Bala anesthesiology probation OHSU_RB 000730 (Dep Ex. 59)			
54	11/25/15	Strahm meeting notes of meeting w Henrikson, Cigarroa re Kirsch blast OHSU_RB 000731 (Dep Ex. 94)			
55	12/2/15	Email re plan to get Bala back in lab/probation OHSU_RB 000727-000729 (Dep Ex. 60)			
56	12/2/15	Email re meeting on 12/2 OHSU_RB 001464-001465 (Dep Ex. 96)			
57	12/2/15	Strahm notes of meeting w Bala on 12/2 OHSU_RB 000719 (Dep Ex. 97)			

58	12/4/15	Email re investigating PEP OHSU_RB 001449-001454 (Dep Ex. 98)			
59	12/8/15	Email btw CH and JK re old notes of meeting with KH, JW and TM OHSU_RB 002200-002201 (Dep Ex. 182)			
60	12/9/15	Email from PS to JC, CH re plan to get RB back in lab/probation OHSU_RB 001846-001847 (Dep Ex. 62)			
61	12/9/15	PS email to staff on case re probation steps OHSU_RB 001915-001916 (Dep Ex. 63, 100)			
62	12/9/15	RB and LS email re PEP and lack of investigation re patient safety complaints OHSU_RB 001447- 001448 (Dep Ex. 99)			
63	12/10/15	Email from RB to Henrikson OHSU_RB 002162-002163 (Dep Ex. 18, 64)			
64	12/10/15	Email from JW to CH re draft of notes of old meeting with KH, JW and TM OHSU_RB 001672-001673 (Dep Ex. 183)			
65	12/10/15	December Summary Notes from Oct nurse EP Discussion OHSU_RB 001673-001674 (Dep Ex. 20)			
66	12/13/15	RB email to LS opposing probation OHSU_RB 000725-000726 (Dep Ex. 65, 66)			
67	12/15/15	LS meeting notes on meeting w CH and RB OHSU_RB 000718 (Dep Ex. 103)			
68	12/21/15	Email w LS re coach for RB OHSU_RB 002067 (Dep Ex. 104)			
69	1/5/16	Email from RB to SK re meeting and PIP (Dep Ex. 196)			
70	1/8/16	LS meeting notes re Chuck “asks” for RB (Dep Ex. 105)			
71	1/13/16	LS meeting notes re RB “asks” of CH OHSU_RB 000689-000690 (Dep Ex. 106)			
72	1/14/16	RB Aggregate Evaluation Report OHSU_RB 002044-001745 (Dep Ex. 101)			

73	1/23/16	RB email to LS re removal of PEP OHSU_RB 001625-001626 (Dep Ex. 107)			
74	1/24/16	RB nice email to Manish and Darpan OHSU_RB 001624 (Dep Ex. 108)			
75	1/27/16	CH and LS email re Karen Paladino and RB issues OHSU_RB 002198- 002199 (Dep Ex. 186)			
76	2/3/16	LS meeting notes w RB and CH OHSU_RB 003841-003842 (Dep Ex. 109)			
77	2/5/16	RB and LS email re Angela OHSU_RB 002080 (Dep Ex. 110)			
78	2/6/16	RB and LS email re Angela OHSU_RB 002158-002159 (Dep Ex. 111)			
79	2/6/16	RB and LS email re Karen Paladino OHSU_RB 002160-002161 (Dep Ex. 112)			
80	2/24/16	LS meeting notes re Rupa meeting OHSU_RB 003845 (Dep Ex. 113)			
81	2/25/16	LS meeting notes re CH meeting OHSU_RB 003849 (Dep Ex. 114)			
82	3/3/16	KP email to LS re JC and “old professionalism concerns” OHSU_RB 002078-002079 (Dep Ex. 117)			
83	3/15/16	Group email re removing PEP OHSU-RB 002117 (Dep Ex. 118)			
84	3/20/16	CH, JC and LS email re removing PEP and selecting coach OHSU_RB 002114-002115 (Dep Ex. 119)			
85	3/21/16	PEP changes to Coaching doc OHSU_RB 003856-003857 (Dep Ex. 120)			
86	4/2016	LS notes of meeting w SK, JC, RB and CH re coaching document OHSU_RB 03852-003855 (Dep Ex. 122)			
87	4/15/16	LS notes of meeting w CH re RB OHSU_RB 000688 (Dep Ex. 187)			
88	4/15/16	KHA email to CH re Julie complaint re Bala (Dep Ex. 215)			
89	4/27/16	LS notes of meeting w CH re non- renewal for RB OHSU_RB 000687 (Dep Ex. 121)			

90	4/29/16	CH email with HR re short contract for RB OHSU_RB 001836 (Dep Ex. 123)			
91	5/2/16	LS meeting notes re RB and CH OHSU_RB 000685-000686 (Dep Ex. 124)			
92	5/3/16	LS email to HR re RB contract renewal OHSU_RB 002085 (Dep Ex. 125)			
93	5/4/16	Bala and LS email re Julie (Dep Ex. 216)			
94	5/8/16	CH email to SK, LS and JC re terminal contract OHSU_RB 001835 (Dep Ex. 126)			
95	5/11/16	LS email to HR re “full one year renewal” OHSU_RB 002084 (Dep Ex. 127)			
96	5/11/16	LS notes of RB and CH meeting re non-renewal OHSU_RB 000683 (Dep Ex. 128)			
97	5/18/16	LS notes of RB meeting re Coach OHSU_RB 000681 (Dep Ex. 129)			
98	5/18/16	LS of meeting w CH re RB OHSU_RB 000680 (Dep Ex. 130)			
99	5/26/16	Email re improvements after Bala PSI (Dep Ex. 230)			
100	6/3/16	HR email to RB re renewal OHSU_RB 001519-001520 (Dep Ex. 172)			
101	6/8/16	LS notes of RB and CH meeting OHSU_RB 000679A (Dep Ex. 131)			
102	6/13/16	LS email w coach re “bad cultural fit” OHSU_RB 002195-002196 (Dep Ex. 132)			
103	6/14/16	LS and RB email re Angela issue OHSU_RB 002145-002148 (Dep Ex. 133)			
104	6/14/16	RB email to LS re issue w Angela OHSU_RB 000673-000674 (Dep Ex. 185)			
105	6/15/16	LS notes of meeting w Angela (date unknown) OHSU_RB 000665-000668 (Dep Ex. 134)			
106	7/1/16	Richardson Letter for Promotion OHSU_RB 000010 (Dep Ex. 8)			
107	7/1/16	Kaul Letter re Salary Increase OHSU_RB 000099 (Dep Ex. 9)			

108	7/2016	Misc meeting notes of Sharon Anderson OHSU_RB 000811-000824 (Dep Ex. 171)			
109	7/2/16	Email to PS re probation email OHSU_RB 002269-002270 (Dep Ex. 68, 135)			
110	7/28/16	Email to LS re stereotypes OHSU_RB 002138 (Dep Ex. 136)			
111	7/29/16	RB email to KHA re error by radiation tech (Dep Ex. 217)			
112	8/8/16	Email RB to Kaul and Stram re "special treatment" OHSU_RB 000659 (Dep Ex. 10, 70)			
113	8/12/16	Email re Holling Incident (Dep Ex. 197)			
114	8/24/16	CH and LS email re Holling OHSU_RB 000661-000662 (Dep Ex. 138)			
115	8/25/16	LS notes re investigation into Holling issue (date is est.) OHSU_RB 000652-000653 (Dep Ex. 139)			
116	9/20/16	RB email to KHA re family during VT storm (Dep Ex. 218)			
117	10/2016	LS notes OHSU_RB 000684 (Dep Ex. 188)			
118	10/12/16	LS notes re investigation into Holling issue (Mehta and Clark) OHSU_RB 000645-000649 (Dep Ex. 140)			
119	10/13/16	LS notes re investigation into Holling issue (Tuan Mai) OHSU_RB 000640-000641 (Dep Ex. 141)			
120	10/21/16	LS notes re investigation into Holling issue (Julie Kelley) OHSU_RB 000642A-000644A (Dep Ex. 142)			
121	10/25/16	Email from LS to RB re escalating concerns to Anderson (Dep Ex. 209)			
122	10/27/16	LS notes re RB quality of care complaint re coding issue RB 000638-000639 (Dep Ex. 143)			
123	10/28/16	LS notes re meeting w CH re RB quality of care complaint re coding issue OHSU_RB 000636 (Dep Ex. 144)			
124	11/10/16	PSI (Dep Ex. 226)			



125	11/10/16	Email btw RB and CH re PSI (Dep Ex. 232)			
126	11/11/16	RB patient care complaint re device preparation (Dep Ex. 219)			
127	11/20/16	Anderson notes of meeting re Bala (Dep Ex. 198)			
128	12/6/16	RB email to KHA and CH re staffing and quality of care (Dep Ex. 222)			
129	12/8/16	Email RB to Richard Potney re sheath prepping BALA 1074-1075 (Dep Ex. 71)			
130	12/9/16	Email re third PSI incident (Dep Ex. 223)			
131	12/10/16	RB email to CH, SA, SK, LS and others re poor training and quality of care OHSU_RB 001557-001558 (Dep Ex. 145)			
132	12/10/16	Email from CG re Bala QC concern re air embolism (Dep Ex. 210)			
133	12/11/16	Email from RB to SA re "critical safety concerns" (Dep Ex. 211)			
134	12/11/16	PSI (Dep Ex. 227)			
135	12/11/16	PSI (Dep Ex. 228)			
136	12/20/16	Kaul email to Bala re Job Posting at Brown (Dep Ex. 199)			
137	12/26/16	RB email with Davis BALA 00520 (Dep Ex. 31)			
138	12/28/16	Email re addl concern re Alicia (Dep Ex. 224)			
139	1/1/17	Notes of QC and PSI issues OHSU_RB 002316-002323 (Dep Ex. 189)			
140	1/11/17	Email between CK and LS re others re poor training and quality of care OHSU_RB 001691-001692 (Dep Ex. 147)			
141	1/12/17	Text w LS and CK re RB meeting OHSU_RB 001418-001419 (Dep Ex. 148)			
142	2/13/17	Email btw LS and CK re PSI re VT Storm incident OHSU_RB 002095-002096 (Dep Ex. 149)			
143	2/13/17	Email btw LS, CK and RB re CK follow up to issues OHSU_RB 001690 (Dep Ex. 150)			

144	2/15/17	Email btw CK, JC and RB re quality care OHSU_RB 002183-002185 (Dep Ex. 151)			
145	2/26/17	Email btw RB, LS and CH re resignation OHSU_RB 000626-000628 (Dep Ex. 152)			
146	3/9/17	Bala email re different treatment (Dep Ex. 200)			
147	3/13/17	Email from Strahm re clinic expectations OHSU_RB 002119-002123 (Dep Ex. 17, 154)			
148	3/24/17	Lund Report article on 2017 faculty survey w link to Dep Ex 159 BALA 00621-00622 (Dep Ex. 158)			
149	3/9/17	2017 Faculty Survey Presentation BALA 00562-00586 (Dep Ex. 159)			
150	3/31/17	Tom Clark apology email to RB OHSU_RB 000876 (Dep Ex. 156)			
151	3/31/17	Email w KH and CH re Tom Clark interaction OHSU_RB 000880-000881 (Dep Ex. 157)			
152	5/22/17	E-mail from JK and Zahr re Culture of Safety OHSU_RB 001896-001899 (Dep Ex. 12)			
153	5/23/17	Email from RB to KH and CH re filing a PSI for staffing safety issue BALA 00596-00600 (Dep Ex. 72)			
154	5/23/17	Email from RB to Chris Swide re PSI / reporting bleeding BALA 1225-1226 (Dep Ex. 73)			
155	5/24/17	Email from JK re Rupa “does not listen” OHSU_RB 002276-002279 (Dep Ex. 74)			
156	9/9/17	Virginia Mason job info VIRGINIAMASON 000030-000036 (Dep Ex. 174)			
157	11/2/17	Email from RB to Jai re job positions BALA 000019-000021 (Dep Ex. 29)			
158	12/26/17	RB email with Davis re behavior BALA 00522 (Dep Ex. 32)			
159	1/26/18	LS interview of Gary Greenburg OHSU_RB 002356-002362 (Dep Ex. 160)			
160	1/30/18	LS Closure memo of Gary Greenburg OHSU_RB 002367-002370 (Dep Ex. 161)			

161	5/18/18	Email re low morale and Bala lawsuit (Dep Ex. 203)			
162	5/25/18	Email from SK to CH and JS re lawsuit filed (Dep Ex. 201)			
163	7/18/18	Lund Report re demotion of JK (Dep Ex. 75)			
164	Undated	Notes re Kirsch 1 (Dep Ex. 234)			
165	Undated	Notes re Kirsch 2 (Dep Ex. 235)			
166	Undated	Notes re Kirsch 3 (Dep Ex. 236)			
167	8/1/18	Forbes email to Anderson re PSI code of conduct violation re Kirsch (Dep Ex. 233)			
168	2/13/19	John Ma investigation report (Dep Ex. 206)			
169	7/17/19	Article – what’s going on at OHSU?, Medium website by Charlie McHenry; David Robinson quoted in article (Dep Ex. 207)			
170	7/2019	Banner HR Doc ( <i>disputed relevance</i> )			
171	7/24/19	Rebuttal to final warning, BANNER 000146-000172 (Dep Ex. 25) ( <i>disputed relevance</i> )			
172	misc	CH text messages OHSU_RB 002106-002113 (Dep Ex. 173)			
173	8/31/15	CH Text w Paladino			
174	10/23/15	CH Texts w Stecker 1			
175	11/20/15	CH Texts w Stecker 2			
176	11/13/15	CH Texts w Cigarroa			
177	10/28/16	CH Texts w Clarke			
178	9/12/17	CH Texts w Rebekah			
179	11/15/17	CH Text w Dewland			
180	12/7/17	CH Texts w Clarke			
181	5/22/18	CH Text w Jim			
182	9/1/18	CH Text w Paladino			
183	12/9/21	OHSU Press release re Covington Report			
184	12/9/21	Covington Report			
185	9/15/23	Dr. Peter Glick PHD Report,			
186	6/29/21	Dr. Molly Carnes MD Report			
187	10/27/23	Broten Report			
188	10/27/23	Tables from Ex 187 – Broten Report			
189	12/14/23	Broten Rebuttal Report			
190	12/14/23	Tables from Ex 189 – Broten Rebuttal Report			
191	2/18/24	Broten Supplemental Report			

192	2/18/24	Tables from Ex 189 – Broten Rebuttal Report			
193	11/1/23	Ostrofe Report			
194	11/1/23	Tables from Ex 193 – Ostrofe Report			
195	1/10/24	Ostrofe Supplemental Report			
196	1/10/24	Tables from Ex 195 – Ostrofe Supplemental Report			
197	1/28/24	Ostrofe Second Supplemental Report			
198	1/28/24	Tables from Ex 197 – Ostrofe Second Supplemental Report			
199	12/15/23	Glusman Rebuttal Report			
200	12/15/23	Table 1 from Ex 199 – Glusman Rebuttal Report			
201	12/15/23	Table 2 from Ex 199 – Glusman Rebuttal Report			
202	12/15/23	Chart from Ex 199 – Glusman Rebuttal Report			
203	1/18/2024	Glusman Supplemental and Rebuttal Report			
204	1/18/24	Table from Ex 203 - Glusman Supplemental and Rebuttal Report			
205	1/18/24	Addl Tables from Ex 203 - Glusman Supplemental and Rebuttal Report			
206	2022	Bala CV			
207	2020	Banner Contract (BANNER 1-21)			
208	2/8/21	UHS contract (BALA 2674-2691)			
209	8/6/21	UHS contract (BALA 2692-2722)			
210	10/14/22	Citrus Offer Letter (BALA 2727)			
211	10/26/22	Citrus Contract BALA 2728-2744)			
212	12/13/23	Contract renewal letter (BALA 2922-2923)			
213	12/17/23	Citrus email re production forecast (BALA 3078-3081)			
214	1/26/24	Citrus Paystub (BALA 3178)			
215	2015-2024	W2 and 1099 Forms 2015-2023			
216	Undated	Summary of 759 pages of mitigation documents			
217	8/22/2022	Recruiter Email			
218	1/2016-1/2020	Jan 16-Jan 20 job search (BALA 1-109) (109 pages)			
219	2/2020-6/2020	Feb 20-Jun 20 job search (BALA 1600-1671) (72 pages)			
220	8/2020-11/2020	Aug 20-Nov 20 Job search (BALA 1871-2027) (157 pages)			

221	12/2020	Dec 20 job search (BALA 2028-2150) (119 pages)			
222	1/21-2/21	Jan 21 – Feb 21 Job Search (BALA 2151-2260) (114 pages)			
223	6/21-10/22	June 21- Oct 22 job search (BALA 2298-2439) (188 pages)			

DATED this 11<sup>th</sup> Day of March, 2024

s/Matthew C. Ellis

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